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August 5, 2020

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

BY ECF
Consent Motion to Change filing schedule

RE: United States v. Robert Wilson, Sr., 16 Cr. 317-17 (PAE)

Your Honor:

This is the second letter motion I am making to request additional time to file a compassionate release motion on behalf of Mr. Wilson. The first resulted in a filing date of today, August 5th, but I am not going to be able to meet that schedule.

I was assigned to represent Mr. Wilson on July 20, 2020, as a result of a letter he wrote to the former Judge in this case, the Honorable Katherine Forrest. I had never had any prior contact with the case or with Mr. Wilson.

Since my appointment I have obtained some information about Mr. Wilson's medical condition and I have researched the status of the Covid-19 pandemic as it affects FCI Allenwood Medium, which is the institution he is in. I have not, however, actually been able to make direct contact with my client, which is partially my fault because of other pressing applications and legal work I am trying to complete on other cases.

According to the BOP website page which gives information on the state of the pandemic in each federal institution, Allenwood Medium has not had any inmates who tested positive for the virus, and only one staff member, who is now considered "cured." Thus, Mr. Wilson's application does not appear to have the

same level of urgency as others I am working on.

I am asking for an additional two weeks to file the motion to August 19, 2020, with the government's response date being one week after that (August 26, 2020).

I communicated yesterday with AUSA Mark Eli who is handling this matter for the government and he has no objection to the request.

Thank you very much in advance.

Sincerely,

/s/ Thomas H. Nooter
THOMAS H. NOOTER
Attorney for Defendant

cc: Mark Eli, by ECF

Granted. Defense counsel's submission is due August 19, 2020, and the Government's response is due August 26, 2020. The Clerk of Court is respectfully directed to close the motion pending at docket 651.

SO ORDERED.

Paul A. Engelmayer
PAUL A. ENGELMAYER
United States District Judge

August 6, 2020